



NATIONAL SECURITY AGENCY  
CENTRAL SECURITY SERVICE

# FY2020 National Security Agency Affirmative Action Plan

Affirmative Action Plan for the Recruitment, Hiring,  
Advancement, and Retention of Persons with Disabilities



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**Note:** This is a summary of input to the MD-715 report and annual progress towards meeting EEOC-established goals for persons with disabilities in the federal workplace.

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

## Section I: Efforts to Reach Regulatory Goals

*EEOC regulations (29 CFR §1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with disabilities and persons with targeted disabilities in the federal government*

Using the goal of 12% as the benchmark, the agency does not have a trigger involving PWD by grade level cluster in the permanent workforce for Cluster GS-1 to GS-10 (PWD) or for Cluster GS-11 to SES (PWD).

The percentage of the workforce that self-identifies as having a disability increased from 11.0% in FY2019 to 11.9% in FY2020, which is below the goal of 12%.

Using the goal of 2% as the benchmark, the Agency does not have a trigger involving PWTD by grade level cluster in the permanent workforce. The percentage of the workforce that self-identifies as having a targeted disability increased from 2.5% in FY2019 to 2.6% in FY2020, which is above the goal of 2%.

The Agency has communicated the numerical goals to the hiring managers and/or recruiters. The goals were presented and reviewed in the annual recruitment kick-off meeting. The goals are also included on daily hiring reports and in the online hiring tool. Recruitment is regularly updated about progress made towards hiring persons with disabilities including those with a targeted disability.

## Section II: Model Disability Program

*Pursuant to 29 CFR §1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.*

### A. PLAN TO PROVIDE SUFFICIENT AND COMPETENT STAFFING FOR THE DISABILITY PROGRAM

The Agency has designated sufficient qualified personnel to implement its disability program during the reporting period. The Agency employs:

- Two full-time Recruitment Program Managers to process applications and reasonable accommodation requests from PWD and PWTD in addition to answering questions from the public about hiring authorities that take disability into account.
- Three full-time employees in Installations and Logistics to oversee compliance to the Architectural Barriers Act.
- One Special Emphasis Program Manager to support the special emphasis program for people with disabilities and people with targeted disabilities.
- Three full time employees to process reasonable accommodation requests in addition to one full-time employee fulfilling the role as a collateral duty.
- Four full-time employees to oversee compliance with Section 508 in addition to one part-time employee and one full-time employee fulfilling the role as a collateral duty.
- One part-time Disability Program Manager.

The Agency has provided sufficient training to disability program staff to assist in their responsibilities during the reporting period, including the following activities:

- The Reasonable Accommodation Managers (RAMs) each received a minimum of 20 hours of continuing education in the past year including coursework through CDMS.org, Certified Disability Management Specialist, which focuses on disability management in the workplace. In addition, training through the Great Plains ADA Center focused on specific issues regarding workplace accommodations for individuals with disabilities. RAMs also completed specific training to maintain their certifications and licensure in the nursing, employee assistance, and social work fields.
- The Sign Language Interpreters completed courses and activities as part of the Job Quality Standard (JQS) to gain and enhance extra-linguistic knowledge of the environments in which they interpret. The courses offered through the National Cryptologic School are standard issue computer-based modules incorporated into an interpreting-centric curriculum. The Office of Reasonable Accommodations and Accessibility also provided a quarterly in-house training session for the sign language team. Members of the Intelligence Community attended one session, resulting in interpreters from six agencies contributing to broader, peer-to-peer learning.

## B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

The Agency has provided sufficient funding and other resources to implement the disability program successfully during the reporting period. The Office of Reasonable Accommodations & Accessibility has a full staff and collaborates with Installations & Logistics, 508 Compliance support, and the Disability Recruitment Program Managers for external recruitment to support employees and applicants.

## Section III: Plan to Recruit and Hire Individuals with Disabilities

*Pursuant to 29 CFR §1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. Identify outcomes of the agency's recruitment program plan for PWD and PWTD.*

## A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

The Agency uses various programs and resources to identify job applicants with disabilities, including individuals with targeted disabilities. In FY2020, the Program Managers for Disability Recruitment participated in numerous disability-focused outreach and recruitment events including:

- Career Expo at Gallaudet University in Washington, D.C.,
- EOP's Careers & the DisABLED Virtual Career Expo (2 events),
- Rochester Institute of Technology (RIT),
- NTID Fall Career Fair,
- Melwood Diversity Conference (Neurodiversity in the Workplace)
- National Federation of the Blind (NFB) 53<sup>rd</sup> Annual Convention (3 outreach events)
- Bender Virtual Career Fair,
- Mid-Atlantic ADA Expo,
- New Jersey Division of Vocational Rehabilitation Services (NJDVRS) Recruitment and Inclusion Job Fair,
- Ability Job Fair,
- Intelligence Community (IC) Virtual Career Fairs
- IC Deaf & Hard of Hearing Summit.

The NSA's External Recruitment and Hiring fulfills its Diversity Recruitment Strategic Plan through community outreach and marketing events. We research and attend specific professional events knowing the attendees will be people with both Targeted Disabilities and people with Non-Targeted Disabilities. The NSA uses the Schedule A Hiring Authority in an indirect capacity, to source, recruit, and hire underrepresented talent into the permanent workforce. Through involvement with the Workforce Recruitment Program, the Bender Virtual Career Fair, the Careers and the disabled Expo, and on-campus outreach events, the Agency brands our culture of diversity and inclusion. Once a year, External Recruitment and Hiring hosts a Career Invitational for people with a disability. Candidates are sourced from these programs/events and invited to interview at a full-day event. The Agency attributes successfully reaching our Targeted and Non-Targeted Disability hiring goals directly to this event. The External Recruitment and Hiring division also leverages our Employee Resource Groups at the grass roots level to engage with student organizations at colleges and universities throughout the U.S. We foster relationships with both Disability Affairs and Veteran Affairs at Centers of Academic Excellence (CAE) schools through the utilization of the Campus Ambassador Program. Through these recruitment strategies, the Agency continues to meet its hiring goals in FY2020, for attracting applicants who self-identify as a person with a disability or a person with a targeted disability.

NSA is already a part of the excepted service and can make appointments without having to use competitive selection like most other agencies. Therefore, NSA need not invoke Schedule A authority when individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A).

The Program Manager for Disability Recruitment sources candidates with a documented disability from a variety of channels. External Recruitment and Hiring Recruiters and Staffing Leads receive applications from the Program Managers for Disability Recruitment. Applicants who meet minimum qualifications and are determined to be qualified are forwarded to the appropriate Hiring Managers. The Staffing Lead, Disability Recruitment Program Manager, or the Recruiter will share with the Hiring Manager if the candidate was sourced by the Targeted Disability Resource.

The Agency has provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A). The Agency developed and released a new fully accessible Disability Awareness training with mandatory completion requirements once every three years.

## **B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS**

The Agency has made efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment. Contacts with professionals associated with the Maryland Rehabilitation Services as well as with the National Federation for the Blind of Maryland are ongoing.

## **C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)**

Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, there are no triggers that exist for PWD and/or PWTD among the new hires in the permanent workforce.

Using the qualified applicant pool as the benchmark, there are no triggers that exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO).

Using the relevant applicant pool as the benchmark, we were unable to determine if triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the mission-critical occupations (MCO). The Agency does not promote to work-roles therefore, reportable data does not exist for this category of the MD-715.

Using the qualified applicant pool as the benchmark, we were unable to determine if triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO). The Agency does not promote to work-roles therefore, reportable data does not exist for this category of the MD-715.

## Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

*Pursuant to 29 CFR §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.*

### A. ADVANCEMENT PROGRAM PLAN

The Affirmative Action Plan Council (AAPC) engaged in affirmative actions to improve advancement for employees with disabilities in the last year. The Council offered sessions of a course that teaches about the Agency promotion process specifically for employees with disabilities. It worked with Employee Resource Group (ERG) leadership to share information on Agency career development programs at a People with Disabilities Employee Resource Group (PWD ERG) meeting and posted the information to the ERG webpage for further reference. Working collaboratively with Agency organizations, the Council ensured that the Job Enrichment Board, which houses career enhancing opportunities for the entire workforce, is accessible and useable by all. The People with Disabilities Employee Resource Group also hosted a mentoring group specifically for the members with disabilities.

### B. CAREER DEVELOPMENT OPPORTUNITIES

In FY2020, the Affirmative Action Plan Council ensured that members of the PWD ERG are aware of career development programs by discussing them at a PWD ERG meeting and posting information about the programs to the ERG webpage. The Council ensured the accessibility and usability of the Agency-wide Job Exchange Board that houses career enhancing opportunities. The Council also organized a briefing on an Agency Senior Technical Development Program to the PWD ERG.

Triggers do not exist for PWD among the applicants and/or selectees for any of the career development programs. The absence of triggers is mostly due to the extremely small group sizes for applicants and selectees.

Triggers do not exist for PWTD among the applicants and/or selectees for any of the career development programs. The absence of triggers is mostly due to the extremely small group sizes for applicants and selectees.

### C. AWARDS

Using the inclusion rate as the benchmark, the Agency has a trigger involving PWD and PWTD for any level of the time-off awards, bonuses, or other incentives using the inclusion rate of PWD=12%; PWTD=2%.

Using the inclusion rate as the benchmark, the Agency does not have a trigger involving PWD or PWTD for quality step increases or performance-based pay increases.

The agency does not have other types of employee recognition programs.

### D. PROMOTIONS

The agency has some triggers involving PWD among the qualified internal applicants and/or selectees for promotion to the senior grade levels.

There are no triggers for Qualified Internal PWD Applicants at the following levels: SES, Grades GS-14 and GS-13. There are no triggers for Internal PWD Selections at the SES level or Grade GS-14.

Triggers exist for Internal PWD Selections at the following levels: Grades GS-15 and GS-13.

Fails to meet the 4/5th rule: GG15, GG14, GG13

There are no triggers for Qualified Internal PWTD Applicants at the following levels: SES, Grades GS-15, GS-14 and GS-13. There are no triggers for Internal PWTD Selections at the SES level.

Triggers exist for Internal PWTD Selections at Grades GS-15, GS-14, and GS-13.

Fails to meet 4/5th rule: GG-15, GG14, and GG13

Using the qualified applicant pool as the benchmark, the agency does not have triggers involving PWD among the new hires to the senior grade levels for any level (SES, GS-15, GS-14, or GS-13).

Using the qualified applicant pool as the benchmark, the agency does not have triggers involving PWTD among the new hires to the senior grade levels for any level (SES, GS-15, GS-14, or GS-13).

The agency does not have triggers involving PWD among the qualified internal applicants and/or selectees for promotions to supervisor positions. NSA is a rank in person Agency and there is no promotion associated with a change in position.

The Agency does not have triggers involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions. NSA is a rank in person Agency and there is no promotion associated with a change in position.

Using the qualified applicant pool as the benchmark, the agency does not have a trigger involving PWD among the selectees for new hires to supervisory positions that include executives, managers, and supervisors.

Using the qualified applicant pool as the benchmark, the agency does not have a trigger involving PWTD among the selectees for new hires to supervisory positions that include executives, managers, and supervisors. The benchmark of 12% and 2% is used for Persons with Disabilities overall and Targeted Disabilities, respectively, since applicants do not apply directly to a management position.

## Section VI: Plan to Improve Retention of Persons with Disabilities

*To be a model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable accommodation program and workplace assistance services.*

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

In this reporting period, the agency did not convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i)). NSA is already a part of the excepted service and can make appointments without having to use competitive selection like most other agencies. Therefore, NSA need not invoke Schedule A authority.

Using the inclusion rate as the benchmark, the percentage of PWD among voluntary and involuntary separations did not exceed that of persons without disabilities for voluntary or involuntary separations (PWD).

Using the inclusion rate as the benchmark, the percentage of PWTD among voluntary and involuntary separations did not exceed that of persons without targeted disabilities for voluntary or involuntary separations (PWTD).

## B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

*Pursuant to 29 CFR §1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. §794(b), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. §4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.*

NSA is exempt from Section 508 compliance, for national security systems; however, NSA is not exempt from the requirement to make administrative software systems accessible. The notice explaining employees and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint was posted on the external and internal Agency webpages in 2020. Employees and applicants' rights under the Architectural Barrier Act, including a description of how to file a complaint, is provided via direct link from the Diversity, Equality & Inclusion Accommodations & Accessibility webpage of the NSA.gov website.

NSA Installations & Logistics (I&L) organization is continually reviewing and surveying the buildings and exteriors to identify areas where NSA can provide improved accessibility. Existing program elements are under evaluation to determine opportunities for improvement. The Agency's Engineering Standards Board (ESB) and design discipline working groups are making continuous efforts to examine Facilities Criteria, in accordance with the supplemental requirements to DoD Unified Facilities Criteria, and develop standards updates to assure and implement compliance and reasonable accommodation measures.

For new construction and renovations, Design Quality Assurance and Quality Control (QAQC) is performed by expert technical personnel to guide and verify ABA-compliant design products and includes coordination with the Diversity, Equality and Inclusion organization. Accommodation Programs include:

Automatic Door Opener Program (ADO): The Chief of I&L initiated this program to install, at a minimum, one ADO per office suite, which is over and beyond the ABA standards. This effort started in 2017 continuing through 2021, and is now an Agency standard for all new fit-ups.

Exterior Walkway Improvements: A recent study, which was completed, of the NSA campus sidewalk conditions. This initiative entered construction for corrective action in FY2019. This will bring sidewalks up to compliance with ABA standards.

Restroom Upgrades: I&L started major restroom renovations at NSAW in 2016, which will continue to address the aging facilities and ensure all restrooms, are ABA compliant. Renovations will include installing accessible fixtures to improve Agency standards tailored to Agency personnel needs.

Single User Restrooms: In 2017, Agency Senior Leadership supported the initiative to install, at a minimum, one ABA compliant Single User Restroom per location of men's and women's facilities for new construction, furnished with signage for dual gender use, to include wheelchair accessibility. This initiative has become the Agency's standard for facility improvements to follow.

Elevator Upgrades: During life cycle replacement of elevators at NSAW, elevators are being upgraded to ensure ABA compliance. Upgrades started in 2016 and are currently ongoing.

Cafeterias: The primary cafeteria upgrade design was completed and design renovations kicked-off this year, FY2020. With full infrastructure renovation, the cafeteria will meet the latest ABA requirements to ensure accessibility. Two other cafeterias have undergone food service upgrades and with the construction completed within the last year, now provide compliant, accessible food service for Agency personnel.

Core Renovations: The Agency is currently designing several thousand square feet of office space and common areas in a key, older building that is slated for Core renovation. Design kicked-off in FY2019 for construction in FY2020 and will bring all spaces under limits of design into ABA compliance and Agency standards above and beyond code requirements.

Intersections Adaptive Technology: I&L is expanding the traffic signaling system and tying it into existing Adaptive Technology system, which will provide ABA compliant traffic signaling and crosswalk intersection communicating.

Enterprise Accessibility Council (EAC): The EAC is an information sharing, investigative and recommendation body, with representation across the enterprise. The purpose of the Council is to lead efforts with the goal of making NSA the model for physical accessibility, digital accessibility, diversity, equitable outcomes and inclusion throughout the Intelligence Community, and ensure that buildings and facilities, as well as information and communication technology (ICT) are not a barrier to opportunities for any employee.

## C. REASONABLE ACCOMMODATION PROGRAM

*Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.*

Implementation of workplace accommodations occurs within 21 business days upon receipt of documentation from the employee.

The reasonable accommodation process provides guidance on how to request workplace accommodations. The process from request to implementation takes approximately 7-21 days. Mandatory Disability Awareness Training has launched as a requirement for coworkers, managers, recruiters, and hiring managers. The course requirement must be fulfilled every 3 years. There is also sensitivity training available upon request as a workplace accommodation. Trends related to the number of requests for particular accommodations, implementation time, accommodations equipment requested, security requirements and limitations, location of employees with disabilities, and total number of accommodation requests are monitored and adjustments are made as necessary.

## D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE

*Pursuant to 29 C.F.R. §1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.*

The Workplace Care Attendant program has been up and running for several years now, and awarded a new contract in September 2017. Under the current contract, the care assistants not only meet the daily needs for toileting and feeding (Activities of Daily Living) for employees who require it, but they are also able to assist in the OHES Medical Center Acute/Urgent Care clinic providing their services as care assistants. Employees and applicants who need assistance with their activities of daily living are referred to the Program Manager, and a collaborative agreement between employee and assistant is made to meet the employee's needs.

The Agency posts procedures for requesting PAS on both external and internal websites for the benefit of applicants and employees.

## Section VII: EEO Complaint and Findings Data

### A. EEO COMPLAINT DATA INVOLVING HARASSMENT

During the last fiscal year, the percentage of PWD who filed a formal EEO complaint alleging harassment was not higher than the government-wide average. During the last fiscal year, there were no complaints alleging harassment based on disability status to result in a finding of discrimination or a settlement agreement.

There were no findings of discrimination alleging harassment based on disability status during the last fiscal year for formal EEO complaints. The government-wide average for formal complaints filed by people with disabilities for harassment is 20.82% and for failure to accommodate is 14.02%.

## B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

During the last fiscal year, the percentage of PWD who filed a formal EEO complaint alleging failure to provide a reasonable accommodation was not higher than the government-wide average.

The agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year. The Agency is implementing a new mandatory requirement for supervisors to complete Disability Awareness training for FY2020. Further, additional sign language interpreters were hired.

## Section VIII: Identification and Removal of Barriers

*Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.*

The agency has identified barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD.

The agency has established a plan to correct the barrier(s) involving PWD and/or PWTD.

Promotion rates for persons with disabilities is lower in all grades when compared to employees without a disability. The barrier is the current promotion process. In 2018, the Agency completed a full barrier analysis to determine a cause. After quantitative and qualitative analysis, final recommendations were made to eliminate the identified barriers.

In 2019, the Agency established the Affirmative Action Plan Council to support requirements outlined by EEOC and fully implement the recommendations from the barrier analysis of persons with disabilities. The Agency will monitor the implementation of the recommendations through 2021.